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January 5, 2007

VIA E-MAIL AND FIRST CLASS MAIL
AUSA John C. Truong
Office of the U.S. Attorney
Civil Division
555 Fourth Street, N.W.
Washington, D.C. 20530

Re: Elion v. Jackson, Civ. Action No. 05-0992 (PLF)

Dear John:

As I was reviewing this case in anticipation of your call on Monday, I looked to see whether defendant had disclosed or otherwise identified the former Director of the OIG Division of Technical Oversight and Planning, Stanley McLeod, as an individual likely to have discoverable information, as that term is used in Rule 26(a)(1)(A), Fed. R. Civ. P. I saw that he had not. Accordingly, I am identifying Mr. McLeod as required by Rule 26(e), and as may be required in response to Defendant's 1st Interrogatory No. 20 and 1st RFP's Nos. 1, 7, and 13. Specifically, Mr. McLeod may have knowledge of the purported need to reassign two staff members of the Headquarters Audit Division to the Division of Technical Oversight and Planning. His knowledge of this subject will be found in the transcript of his deposition in Beard v. Jackson, Civ. Action No. 06-0756 (D.D.C.), which was attended by OIG counsel in this case, Rick Johnson.

Very truly yours,

Robert C. Seldon

Cc: Saundra G. Elion